

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

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**VIKRAM P. GROVER d/b/a  
“IX ADVISORS” a/k/a “IXA,”**

**Plaintiff,**

**v.**

**NET SAVINGS LINK, INC., a  
Colorado corporation and formerly  
organized as a Nevada corporation,  
WILTON GROUP, LIMITED, as  
registered in the Isle of Man, U.K.,  
WILTON UK (GROUP), LIMITED, as  
registered in England and Wales, U.K.,  
CHINA FOOD AND BEVERAGE CO.,  
a Colorado corporation, and  
JAMES A. TILTON,**

**Defendants.**

**v.**

**PACIFIC STOCK TRANSFER,  
NSAVX, INC., a Wyoming corporation,  
JOHN DOE CORP., a/k/a  
NSAVX.COM, a Puerto Rican  
corporation, and JOHN DOES 1-100,**

**Trustee-Defendants.**

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**Civil Action No. 1:21-CV-05054**  
**Honorable Mary M. Rowland**

**REQUEST FOR ORAL**  
**ARGUMENT ON AN**  
**EMERGENCY BASIS**

**PLAINTIFF VIKRAM P. GROVER’S EMERGENCY MOTION FOR  
APPOINTMENT OF JOHN BUSACCA AS CHIEF RESTRUCTURING  
OFFICER FOR DEFENDANT NET SAVINGS LINK, INC.**

The Plaintiff, Vikram P. Grover d/b/a IX Advisors a/k/a IXA (hereinafter the “Plaintiff,” or “Plaintiff Grover”), pursuant to Federal Rule of Civil Procedure 66 and the Local Rules of the U.S. District Court for the Northern District of Illinois, respectfully moves this Honorable Court, on an

emergency basis, on a Short Order of Notice for a remote or telephonic hearing on Wednesday, July 17, 2024, which is the third (3<sup>rd</sup>) business day after the filing of the instant Emergency Motion, or at such date as may be reasonably convenient for the Court, for an Order appointing John Busacca (hereinafter “Mr. Busacca”) as Chief Restructuring Officer (hereinafter the “CRO”) of the Defendant, Net Savings Link, Inc. (hereinafter the “Defendant,” or “NSAV”), and any and all subsidiaries, affiliates, parents and/or entities and/or agents acting in concert with them with actual notice of this Court’s orders, including but not limited to NSAVx, Inc., a corporation duly organized in the State of Wyoming (hereinafter “NSAVx-Wyoming”), and John Doe Corp. a/k/a NSAVx.com, a corporation duly organized in Puerto Rico (hereinafter “NSAVx-PR”), and John Does 1-100 (hereinafter “John Does” and collectively, with NSAVx-Wyoming, NSAVx-PR, and the John Does, hereinafter as the “Defendant-Agents”), with the powers (1) traditionally granted to a receiver pursuant to 28 U.S.C. §3103(b)(1), and (2) those powers traditionally granted to CROs, especially, in the form of:

- a) to order, prohibit and preclude the Defendant and Defendant-Agents, and together with those parties’ officers, agents, servants, employees, and attorneys, and other persons who are in active concert or participation with anyone described in Federal Rule of Civil Procedure 65(d)(2)(A) or (B), and any and all alter egos, affiliates and/or third-parties with actual notice of the Court’s order (collectively hereinafter the “Enjoined Defendants”) from transferring, conveying, distributing and/or otherwise moving, directly and/or indirectly, any and all assets, tangible or intangible of the Defendant and Enjoined Defendants to any other party, third-persons and/or entity so

as to enforce the injunction and attachment orders entered by this Court against the Defendant and Enjoined Defendants on June 27, 2024; and

- b) to demand, access and examine all corporate records, financial records, financial statements, financial documents, assets, monies, credits, bank accounts, cryptocurrency wallets, complete details, data and information as to any and all shares of common stock and/or other classes of stock of the Defendant and each of the Enjoined Defendants, as held from September 23, 2021 to the date of the Order, and any and all contracts of the Defendant and Enjoined Defendants, or those contracts entered into by the Defendant's and Enjoined Defendants' officers, agents, servants, employees, and attorneys, to determine the existence and amount of any and all assets, tangible or intangible, of the Defendant and Defendant-Agents; and
- c) to preclude and prohibit the Defendant and the Enjoined Defendants from creating, issuing, and/or establishing any additional or new classes of equity or debt of any such Defendant or Enjoined Defendant, without the prior written approval of the CRO; and
- d) to take possession and seize any and all assets, tangible or intangible, of the Defendant and Enjoined Defendants, up to and including the amount of \$64,796,626.16 for the sole purpose of satisfying the outstanding, proposed final judgment that Plaintiff has against Defendant; and
- e) to order and enjoin any and all employees and insiders of the Defendant and Enjoined Defendants from posting, distributing, disseminating, disclosing, or otherwise discussing material, non-public information, and/or false and

misleading information, on the Internet and social media platforms such as Discord, X.com (formerly known as “Twitter”), InvestorsHub, StockTwit, or other similar websites, platforms, or interfaces, about the corporate and legal activities of the Defendant or Enjoined Defendants that have not previously been disclosed in an official Press Release or Form 8-K to the Defendant’s or Enjoined Defendants’ shareholders.

The Plaintiff respectfully requests oral argument at a hearing, on an emergency basis, on a Short Order of Notice for a remote hearing on Wednesday, July 17, 2024, which is the third (3<sup>rd</sup>) business day after the filing of the instant Emergency Motion, or at such date as may be reasonably convenient for the Court.

WHEREFORE, the Plaintiff, Vikram P. Grover, respectfully moves this Honorable Court, on an emergency basis for an Order appointing John Busacca as CRO of the Defendant and Defendant-Agents, in the form requested herein. The Plaintiff requests a hearing, on an emergency basis at a remote or telephonic hearing on Wednesday, July 17, 2024, or at such date as may be reasonably convenient for the Court.

Dated: July 12, 2024

Respectfully submitted,  
PLAINTIFF, Vikram P. Grover,  
By his Attorneys,

/s/ Philip M. Giordano  
Philip M. Giordano, Esq. (admitted *pro hac vice*)  
Giordano & Company, P.C.  
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**CERTIFICATE OF SERVICE**

I, Philip M. Giordano, do hereby certify that on the 12<sup>th</sup> day of July, 2024, I caused to be served a true and correct copy of Plaintiff Vikram P. Grover's Emergency Motion for Appointment of John Busacca as Chief Restructuring Officer for Defendant Net Savings Link, Inc., as filed by and through the District Court's electronic filing/ECF system and that such true copy is available for downloading and viewing by all counsel and parties of record.

Dated: July 12, 2024

/s/ Philip M. Giordano  
Philip M. Giordano